

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Shiloh Church Road Site - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region III

**Subject:** POLREP #9  
RETRIEVAL OF PCB ARTICLES  
Shiloh Church Road Site  
A38Q  
Nathalie, VA  
Latitude: 36.9699000 Longitude: -78.9807000

**To:** Lauren Pillow, VDEQ  
Ray Earp, VDEM  
Mr. Steven Dishman, Halifax County  
Briana Bill, VDH

**From:** Christine Wagner, OSC  
**Date:** 8/10/2019  
**Reporting Period:** 8/5/19-8/9/19

## 1. Introduction

### 1.1 Background

Site Number:	A38Q	Contract Number:	
D.O. Number:		Action Memo Date:	5/23/2019
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:		Start Date:	6/27/2018
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

#### 1.1.1 Incident Category -- Removal Action

#### 1.1.2 Site Description

The Shiloh Church Road Site consists of three privately owned parcels of property. Two of the properties were historically used for a salvage yard and convenience store. During EPA's Removal Assessment, hazardous substances including, but not limited to PCBs, lead, and radioactive debris were identified. The assessment also revealed the presence of battery casings containing lead third property. The source of the hazardous substances on the third property are related to the other two properties.

##### 1.1.2.1 Location

The Site is located near the intersection of LP Bailey Highway and Shiloh Church Road in Nathalie, Virginia, an unincorporated area of Halifax County.

##### 1.1.2.2 Description of Threat

Elevated levels of volatile organic contaminants in drinking water wells above EPA Maximum Contaminant Levels ("MCLs")  
Elevated levels of PCBs in surface soils;  
Elevated levels of lead in surface soils;  
Drums, cylinders, and other containers which contain hazardous substances;  
Debris and soil which contain radioactive substances.

#### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

A removal assessment indicated that hazardous substances are present which pose an imminent and substantial threat to public health, welfare, and the environment.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

In May and July of 2018, EPA performed a removal assessment at three properties near the intersection of LP Bailey Highway and Shiloh Church Road.

The results of the Removal Assessment indicated the presence of hazardous substances which meet the criteria listed in 40 CFR 300.415b. An Additional Funding Request Exemption from Statutory Limits and Request for Exemption to the 12-Month Statutory Limit and Change in Scope of Work was signed by the Superfund and Emergency Management Director on May 23, 2019.

## **2.1.2 Response Actions to Date**

The gamma walkover was completed on 8/5/19. No additional radiation debris found at the surface.

ERRS began removal and staging of visible PCB articles at the surface. PCB articles include transformers and capacitors, but not batteries. Article locations are being flagged for follow-up excavation. The potential PCB articles are not well marked. No PCB markings were identified.

START was tasked to further define Property #1 into "Areas" according to natural defining points and visible contamination. The Site is moderately forested and EPA does not intend to remove vegetation if necessary. START was also tasked with setting up laboratory support for 5-10 samples per week.

Personal air sampling results were received and forwarded to both ERRS and START Health & Safety officers. EPA, START, and ERRS agreed site operations could be performed in modified Level D (Tyvek, outer boots, and gloves) provided engineering controls remain in place. ERRS has a water truck and operator on Site at all times for dust control

Several small areas of soil which had elevated radiation readings (.3x background) were loaded into the B-25 shipping containers. This soil may contain naturally-occurring radioactive material ("NORM"). Nevertheless, soil containing readings greater than 3x background was packaged for disposal.

ERRS pursued disposal options. Soil/debris containing >1000 mg/kg PCBs will need to be separated. Three waste streams for soil/debris were identified. ERRS also received pricing on disposal of radiation debris and soil. Price is significantly higher if radiation waste stream also contains RCRA hazardous waste

EPA received a Site generator ID number from VDEQ. The Site Generator ID is VAR000535229

## **2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

The source of the potential contamination has not been identified. EPA is working with enforcement officials to develop an enforcement strategy. START is collecting any debris which contains markings. The markings are being documented for possible future PRP response. OSC Duffy contacted a former employee of GE because at least one PCB article had old GE markings. From the old markings, the employee was not able to affirmatively identify if the article contained PCBs.

## **2.1.4 Progress Metrics**

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

## **2.2 Planning Section**

### **2.2.1 Anticipated Activities**

#### **2.2.1.1 Planned Response Activities**

The response actions will include removal of the hazardous substances identified in the Action Memo.

#### **2.2.2 Issues**

## **2.3 Logistics Section**

No information available at this time.

## **2.4 Finance Section**

A modification to the ERRS Task Order was made on 6/29/19, raising the ERRS Site ceiling to \$686,000  
A new Removal TDD was assigned to START. The new ceilings are noted below

The accounting listed below reflects the funding authorized in the May 23, 2019 Decision Document

### **Estimated Costs \***

	<i>Budgeted</i>	<i>Total To Date</i>	<i>Remaining</i>	<i>% Remaining</i>
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$686,000.00	\$324,429.00	\$361,571.00	52.71%
START	\$239,725.00	\$31,047.00	\$208,678.00	87.05%
<b>Intramural Costs</b>				

<b>Total Site Costs</b>	\$925,725.00	\$355,476.00	\$570,249.00	61.60%
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\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

## 2.5 Other Command Staff

### 2.5.1 Safety Officer

Heat is a major concern on Site. Temps in the high 90s is limiting time in the hot zone.  
Hot zone entries are now modified Level D with continuous dust control and perimeter air monitoring

### 2.5.2 Liaison Officer

### 2.5.3 Information Officer

## 3. Participating Entities

### 3.1 Unified Command

Halifax County -Halifax County Emergency Management  
Virginia Department of Health  
Virginia Department of Radiological Health  
Virginia Department of Environmental Quality  
Virginia Department of Emergency Management  
EPA

### 3.2 Cooperating Agencies

ATSDR

## 4. Personnel On Site

EPA - 1  
ERRS - 8  
Perma-Fix - 1  
START - 4

## 5. Definition of Terms

ATSDR - Agency for Toxic Substances Disease Registry  
EPA - US Environmental Protection Agency Region 3  
EPA ERT - Environmental Protection Agency Environmental Response Team  
ER - Environmental Restoration LLC (EPA's cleanup contractor)  
ERRS - Emergency Response and Rapid Services (Contractor)  
HASP - Health and Safety Plan  
MCL - Maximum Contaminant Level for Public Drinking Water Supplies  
PCE - Perchloroethylene, (also known as tetrachloroethylene)  
START - Superfund Technical Assistance Response Team (EPA Contractor)  
SVOC - Semi-volatile organic contaminants  
TCE - Trichloroethylene  
VDH - Virginia Department of Health  
VDEM - Virginia Department of Emergency Management  
VDEQ - Virginia Department of Environmental Quality  
VOC - Volatile Organic Contaminants

## 6. Additional sources of information

### 6.1 Internet location of additional information/report

[response.epa.gov/ShilohChurchRoadSite](http://response.epa.gov/ShilohChurchRoadSite)

## 7. Situational Reference Materials

No information available at this time.